

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE, et al.,

Defendants.

No. 18-cv-2921

Hon. Jesse M. Furman
United States District Judge

**NOTICE OF MOTION TO
WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE THAT pursuant to Local Rule 1.4, it is hereby requested that the appearance of Ajay Saini be withdrawn as counsel for Plaintiffs State of New York, et al. in this matter as his employment with the New York State Office of the Attorney General will conclude on January 17, 2020. Plaintiffs continue to be represented by Matthew Colangelo and other counsel, as indicated on the Court's docket.

The Undersigned counsel respectfully requests this Honorable Court enter an Order granting the motion to withdraw.

Dated: January 17, 2020

Respectfully submitted:

/s/ Ajay Saini

Ajay Saini

Assistant Attorney General

Office of the New York State Attorney General

28 Liberty Street

New York, NY 10005

Tel: (212) 416-8441

danielle.fidler@ag.ny.gov

Counsel of Record for State of New York Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January, 2020, the foregoing Notice of Motion to Withdraw as Counsel was served on all counsel of record via ECF.

/s/ Ajay Saini _____
Ajay Saini

*Counsel of Record for State of New York
Plaintiffs*

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**DECLARATION OF AJAY
SAINI IN SUPPORT OF
MOTION FOR WITHDRAWAL
OF APPEARANCE**

I, Ajay Saini, declare under penalty of perjury that the following is true and correct:

1. I submit this declaration in support of my motion seeking permission from the Court to withdraw my appearance in the above-captioned matter.
2. I am leaving the employment of the Office of the New York State Attorney General, and therefore, I will no longer be able to represent Plaintiffs State of New York, et al. in this matter.
3. Other counsel of record from the Office of the New York State Attorney General will continue to represent Plaintiffs in this action.

Dated: January 17, 2020

Respectfully submitted:

/s/ Ajay Saini

Ajay Saini

Office of the New York State Attorney General

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**[PROPOSED] ORDER
TERMINATING APPEARANCE
OF AJAY SAINI**

WHEREAS, the Court has reviewed the motion of Ajay Saini seeking leave to withdraw as an attorney of record in this matter, as well his declaration in support thereof;

IT IS HEREBY ORDERED THAT the appearance of Ajay Saini in this matter is terminated;

IT IS FURTHER ORDERED THAT the Clerk of Court shall remove Mr. Saini from the docket sheet in this matter.

IT IS SO ORDERED.

Dated: January , 2020
New York, New York

HON. JESSE M. FURMAN
United States District Judge